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7 Attorneys for Defendants
SAMSUNG ELECTRONICS CO., LTD.
8 **SAMSUNG ELECTRONICS AMERICA, INC.**

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 IN RE: CATHODE RAY TUBE (CRT)
14 ANTITRUST LITIGATION

Case No. 3:07-cv-05944 SC

MDL No. 1917

15 This Document Relates To:
16 ALL DIRECT ACTION COMPLAINTS

**DECLARATION OF IAN SIMMONS IN
SUPPORT OF DEFENDANTS' JOINT
MOTION TO DISMISS AND FOR
JUDGMENT ON THE PLEADINGS AS
TO CERTAIN DIRECT ACTION
PLAINTIFFS' CLAIMS**

18 Date: NOVEMBER 30, 2012, 10:00 A.M.
(TENTATIVE)
19 Place: JAMS Resolution Center
20 Special Master: Hon. Charles A. Legge
(Ret.)

1 I, Ian Simmons, declare as follows:

2 1. I am an attorney with O'Melveny & Myers LLP, attorneys for Samsung
3 Electronics Co., Ltd., and Samsung Electronics America, Inc. in this action. I am a member of
4 the bar of the District of Columbia and am admitted to practice before this Court *pro hac vice*. I
5 make this Declaration in support of Defendants' Joint Motion to Dismiss and for Judgment on the
6 Pleadings as to Certain Direct Action Plaintiffs' Claims. If called as a witness, I could, and
7 would, testify to the matters set forth in this declaration of my own personal knowledge.

8 2. Attached hereto as **Exhibit 1** is a true and accurate copy of a letter to Eva W. Cole
9 and Molly M. Donovan from Philip J. Iovieno, dated July 17, 2012.

10 Dated: August 17, 2012
11 Washington, D.C.

12
13 /s/ Ian Simmons
14 Ian Simmons
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